

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

Nos. 22-01102

**NOREEN WISCOVITCH RENTAS AS TRUSTEE
FOR THE ESTATE OF JUAN CARLOS BALCELLS GALLARRETA**

Appellant, v.

AMARILIS GONZALEZ GARCIA

Appellee

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CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

**MOTION TO INFORM APPELLANT BRIEF WAS
NOT SERVED AND REQUEST OF REMEDIES**

TO THE HONORABLE COURT:

COMES NOW, Amarilis González, *pro se*, creditor and co-owner and very respectfully states and prays:

1. On April 27, 2022 Trustee presented motion informing the Brief was due on May 21st, 2022, instead of May 6th, 2022, pursuant to Rule 8018 of the Federal Rules of Bankruptcy Procedures and requested an additional time of one month after due date to file brief.

2. I was never served by Trustee and after reviewing Pacer page and calling the Court, I confirmed that Trustee had filed a brief on June 17, 2022.

3. The Rule 8018 of the Federal Rules of Bankruptcy Procedures regarding Serving and Filing Briefs; Appendices states:

(a) Time to Serve and File a Brief.

(1) The appellant must serve and file a brief within 30 days after the docketing of notice that the record has been transmitted or is available electronically.

(2) The appellee must serve and file a brief within 30 days after service of the appellant's brief.

4. The Trustee Appellant has not complied with the Rule 8018 of the Federal Rules of Bankruptcy Procedures. The Brief was not served when filed and, as of today, Trustee's brief has not been served to the Appellee. Trustee has not complied with due process.

5. Appellee requests this Honorable Court/Panel to Dismiss Appellation. In the alternative, Appellee requests the Court to Order Trustee to serve the Brief to Appellee and apply the term of 30 days after service pursuant Rule 8018 of the Federal Rules of Bankruptcy Procedures.

6. Trustee has been presenting in the Bankruptcy Court defamatory opinions from the Child Support Case that were fabricated to provoke professional damages which Trustee is using to deviate the attention from the issues presented to continue with her frivolous claim and scheduled plan. Such documentations are violations to P.R. Professional Ethics Code. Appellee requests additional 30 days to evaluate the defamation issues and present any claim accordingly.

WHEREFORE, Appellee's respectfully requests this Court to dismiss the Appellation for Trustee's failure to comply with the Federal Rules of Bankruptcy Procedures, in the alternative, order Trustee to serve brief, provide 30 days after service to respond and provide 30 additional days to evaluate defamation issues.

CERTIFICATE OF SERVICE It is hereby certified that I sent the foregoing to the Clerk of the Court, which will send notifications of such filing to all parties in the case.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, on July 5, 2022.


Amarilis González, *pro se*
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